

# **EXHIBIT 7**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JOHN DOE #1, an individual; JOHN )  
DOE #2, an individual; and PROTECT )  
MARRIAGE WASHINGTON, )

Plaintiffs, )

v. )

No. 09-CV-05456-BHS

SAM REED, in his official capacity )  
as Secretary of State of Washington; )  
BRENDA GALARZA, in her official )  
capacity as Public Records Officer )  
for the Secretary of State of )  
Washington, )

Defendants. )

Deposition Upon Oral Examination  
of  
**REDACTED**

Taken by: Tracey L. Juran, CCR  
CCR No. 2699

September 24, 2010  
Everett, Washington

1 possibly change the outcome of the election.

2 I haven't been hiding anything -- I answer frankly  
3 when I am asked where I stand on issues -- but I do not  
4 want to be portrayed as a single-issue candidate. And  
5 my focus all along has been on jobs, education, and  
6 fiscal responsibility. My campaign is not about the  
7 social issues.

8 Q. I can tell you that the trial in this case would not  
9 occur prior to the election. In fact --

10 A. Mm-hm.

11 Q. -- our next time that we go just to talk to the judge  
12 about when the court date will be set isn't until  
13 November 15th, so it will be after the election.

14 With that understanding, would you have any  
15 concerns about publicly testifying in a federal court?

16 A. No.

17 Q. If you're ready now, I'd like to --

18 A. Sure.

19 Q. -- explore that phone call that you received.

20 A. Yes. So let me give a little bit of background. My  
21 parents were visiting from Illinois and my sister --  
22 youngest sister, also from Illinois, were visiting and  
23 were staying with us in order to attend the campaign  
24 kickoff on the 24th. On Sunday morning, the 23rd,  
25 the -- I was on the front page of the newspaper with the

1 article that we've spoken about.

2 And at 6:00 that night, we received a phone call on  
3 our unlisted home phone number. My 13-year-old answered  
4 the phone -- REDACTED is his name -- and I heard him  
5 say, yes, just a moment, please. Mom, it's for you.  
6 And I was in the living room, he was in the kitchen.  
7 It's an open -- kind of open hallway there. And as I  
8 walked across the floor towards the phone, his face went  
9 white and he said, Mom, you just got a death threat. He  
10 said, I will kill you and your family.

11 I continued walking towards the phone as he was  
12 relaying this to me, and right when he finished I was at  
13 the phone and picked it up, but the man had already hung  
14 up. My parents were in the room sitting on the couch  
15 and my husband was in the room and my 6-year-old  
16 daughter was in the room, and all of us became  
17 immediately frightened and very aware of where the  
18 windows are. I was immediately angry and resolved --

19 Q. Do you --

20 A. -- that I would not back down from this candidacy from a  
21 threat like that.

22 Q. Do you have caller ID on your home phone number?

23 A. We did not at that time.

24 Q. Did you press star 69 to get the number?

25 A. No, because we don't have caller ID. So I thought about

1 calling star 69, but since it would just call him  
2 back -- call an angry person back, I wondered, well, how  
3 is that going to help anything? Then I have an angry  
4 man on the other end. I still don't know his number.

5 Q. So it's your understanding that star 69 dials the number  
6 that just called?

7 A. Yes. I thought it would redial.

8 Q. Is that still your understanding?

9 A. I know that star 57 will trace a call. The policeman  
10 told me that.

11 Q. And did you press star 57?

12 A. No. I did not know that until after the cops came.

13 Q. And did you call the police when you received that  
14 phone --

15 A. Yes.

16 Q. -- call?

17 And how long did it take them to respond?

18 A. We live very near the police station in downtown Edmonds  
19 and they were there, I would say, perhaps five minutes  
20 or less. It didn't take long.

21 Q. So it was the Edmonds Police Department that you called,  
22 the --

23 A. Yes.

24 Q. -- city police?

25 A. Well, I called 911 and I assume I was immediately

1 directly routed to the Edmonds Police.

2 Q. And do you remember the name of the officer who  
3 responded?

4 A. Yes. It was Andrew Mehl, M-E-H-L.

5 Q. And did the officer take a report?

6 A. Yes. He took two reports, one from me and one from my  
7 son.

8 Q. Did you make a written statement? Is that the report  
9 that you're referring to?

10 A. Yes, I believe I did.

11 Q. And did the officer talk to you about the incident?

12 A. Yes. He tried to reassure me that death threats are  
13 fairly common, which I found hard to believe. He told  
14 me that, if anything strange happened, that we should  
15 call immediately. He said, for example, if someone  
16 seems to be watching the house or following you, you  
17 need to report it.

18 He told us about how -- he said, put a Post-It note  
19 by each one of your phones with star 57. That will  
20 redial -- or not redial, pardon me; will trace the call  
21 and send the information to the police station. So we  
22 did that. He recommended that we get phones with caller  
23 ID and possibly even voice mail -- I mean, not voice  
24 mail; what do you call it -- with an answering machine  
25 so that we could tape messages or conversations. We

1 haven't done that, but we did go out and purchase all  
2 new phones.

3 Q. And you said that you felt that this call was generated  
4 as a result of the article that had run in the REDACTED  
5 newspaper; is that correct?

6 A. Absolutely. It was the same day.

7 Q. And did the caller say that?

8 A. No.

9 Q. Did the caller indicate that any position that you were  
10 taking on any issue was what was triggering the death  
11 threat?

12 A. All that he said I've already told you. He said, I will  
13 kill you and your -- he said, is REDACTED there?  
14 And -- oh, pardon me; I didn't tell you that. But my  
15 son told me and the policeman later that he had asked  
16 for me by name and then had said to him, I will kill you  
17 and your family, and he hung up.

18 Q. So there was no indication of why he wanted to kill you  
19 and your family.

20 A. No. But as you can see by reading the article, there's  
21 nothing else in that article that would have elicited  
22 such fury as to make a person dig to find an unlisted  
23 home number and then call and then threaten a child.  
24 There's nothing else in that article that could possibly  
25 provoke that kind of emotional reaction.

1 Q. Do you know if Tea Party activists have received any  
2 negative publicity or response in this country?

3 A. In this country, yes, but I'm not aware of any around  
4 here who have received threats.

5 Q. Are you aware of any angry words being said about Tea  
6 Party activists in this state?

7 A. Oh, sure. Posts on blogs, I suppose, mm-hm. But I had  
8 already been in the paper as a Tea Party activist before  
9 in the REDACTED and had not received a death threat from  
10 those articles. On REDACTED, I was -- there  
11 was not a picture of me, but my words were on the front  
12 page of the REDACTED and my name, and they said  
13 that I was considering running for office. So at that  
14 point I was not yet a candidate, but I had spoken at a  
15 large Tea Party rally in Everett on the 15th.

16 And so frankly, I think if it were based on just  
17 the phrase "Tea Party," it would be likely that  
18 something might have happened earlier.

19 Q. But this REDACTED article was the first article after you  
20 actually had filed for candidacy?

21 A. There was an article in July. I don't remember the  
22 length of the article or if I was mentioned -- I can't  
23 recall -- but there was a Fourth of July tea party in  
24 Everett that received news coverage from the REDACTED.

25 Q. And that was after you had announced your candidacy?

1 A. Actually announced my candidacy at that rally --

2 Q. And was --

3 A. -- on the Fourth of July.

4 Q. -- that a front-page article --

5 A. No.

6 Q. -- as well?

7 A. No, it wasn't a front-page article.

8 Q. And you're not sure if you were mentioned in the  
9 article?

10 A. No, I don't recall. I might have been mentioned briefly  
11 in it, but I don't recall.

12 Q. So is it fair to say that given this newspaper article  
13 that ran on REDACTED , you suspected that the  
14 individual who called was angry and expressing this  
15 death threat as a result of the one sentence regarding  
16 Referendum 71, but you don't know and it's a guess?

17 A. Well, my cell-phone number was published in the article.  
18 I don't know if it's in this -- no, it's not. This  
19 printed-out version does not show -- on the newspaper,  
20 there was also a little square next to it that talked  
21 about the kickoff the next day. It gave the time and  
22 the place of the kickoff and it gave the Web site and  
23 the phone number, the campaign phone number, which is  
24 also my personal cell number. And they did not call  
25 that number. The person who did this took the time to

1 dig and find the unlisted home phone number.

2 Q. But my question is, it's -- it is -- I understand the  
3 circumstances surrounding it and why you have your  
4 belief, but it is just a belief and a guess and not  
5 fact, correct --

6 MR. PIDGEON: I'm going to object --

7 Q. (by Ms. Egeler) -- with respect to your --

8 MR. PIDGEON: -- as to form of the question.

9 MS. EGELER: Excuse me; I'm still asking the  
10 question.

11 Q. (by Ms. Egeler) -- with respect to your assumption that  
12 this individual was responding to the sentence in the  
13 newspaper article that talked about Referendum 71?

14 MR. PIDGEON: Objection to the form; calls for a  
15 legal conclusion.

16 Go ahead and answer.

17 A. Frankly, as I said before, I see no other possible  
18 sentence in this article that could cause that kind of  
19 emotional reaction.

20 Q. (by Ms. Egeler) Let me ask it differently.

21 Do you know if the individual who called was  
22 mentally ill?

23 A. How could I possibly know that when I don't know who it  
24 is?

25 Q. Is the answer no, then?

1 A. -- but they didn't.

2 Q. Did the police officer explain to you that there's a way  
3 for you to do that?

4 A. No.

5 Q. Do you -- did you ever see the police incident report?

6 A. No.

7 MS. EGELER: Okay, let's mark this as Exhibit  
8 No. 2.

9 [Exhibit 2 marked for identification]

10 Q. (by Ms. Egeler) We have marked as Exhibit No. 2 to your  
11 deposition a police report dated August 23rd, 2009, and  
12 this purports to be a report regarding an incident at  
13 your home.

14 A. Mm-hm.

15 Q. The report states in the last paragraph --

16 A. Mm-hm.

17 Q. -- the third sentence, that the officer advised you that  
18 he would do extra patrols of your house and advise the  
19 other patrol squads.

20 A. Mm-hm.

21 Q. Do you know if the officers did that?

22 A. No, I don't know.

23 Q. Do you have any reason to believe that the police had --  
24 that he promised you something that he didn't deliver?

25 A. No.

1 Q. And then on the next page, it's dated August 24th and it  
2 states that there was a follow-up call to you. Do you  
3 recall receiving a follow-up call the next day from the  
4 officer?

5 A. Yes.

6 Q. And I'll just read the first paragraph. "I called  
7 V-1/REDACTED to inquire as to whether or not anyone had  
8 tried to do call tracing on the incoming call yesterday.  
9 V-1/REDACTED said that they had not as they were not  
10 familiar with the service. I provided her with  
11 instructions for doing so should she get" any "more  
12 suspicious/threatening calls."

13 A. Yes.

14 Q. Did he at that time explain to you how to call the phone  
15 company and get incoming-call records?

16 A. That is when he told me about star 57. And this is, as  
17 you noticed, the next day.

18 Q. I'm confused, because earlier you said that when he came  
19 to your house on the 23rd, he instructed you to put  
20 those stickies near all of your phones.

21 A. Well, I must be misremembering. He must have told us  
22 that the next morning. It was over a year ago.

23 Q. And were you pleased that he called and followed up?

24 A. Yes, I believe so.

25 Q. And that day at your kickoff, did you see any suspicious

1 A. -- would have reported them to the police.

2 Q. And there are no documents -- no other documents,  
3 nothing responsive to the subpoena.

4 A. No, I don't believe so.

5 Q. I just wanted to cover that and make sure that there  
6 wasn't something that you'd brought with you that we  
7 needed to discuss.

8 A. Mm-hm.

9 Q. So if something else had happened, you just said you  
10 would call the police?

11 A. Absolutely.

12 Q. What's your opinion generally of police officers in this  
13 state?

14 A. I think I respect the police officers in this state. I  
15 think they do a good job. I do have some concerns, but  
16 overall, I think they're doing their job to the best of  
17 their ability.

18 Q. And after the Referendum 71 election had concluded in  
19 November of 2009, there's an incident that you were  
20 referring to regarding your son.

21 A. Mm-hm.

22 Q. Can you tell me about that now.

23 A. Yes. On -- at the end of January, the final weekend in  
24 January, my son and I were at a conference for  
25 Republicans at Ocean Shores. And on Sunday morning, we

1 checked out of our hotel and were walking to the car.  
2 My son was following me in the lobby, but when I got to  
3 the car, I realized he wasn't with me. I began to put  
4 the bags that I was carrying into the car and then  
5 closed the back of the car, wondering what had happened  
6 to him.

7 And then he showed up and he was covered head to  
8 toe in applesauce: On his hat, which was an REDACTED  
9 REDACTED campaign hat, his coat, his blue jeans, his shoes,  
10 his suitcase, and a hanging clothes bag that he had had  
11 on one arm. And I said, what happened to you? And he  
12 said, these people drove by and threw applesauce --  
13 threw this all over me. And I said, did you get the  
14 license plate? He said, no.

15 And I said, okay, well, let's get you cleaned up  
16 and then go in and ask if there's a video camera,  
17 security camera. So I helped him get cleaned up and  
18 then he went back in to ask. And I've just finished --  
19 I was cleaning off the bags before putting them in the  
20 car. He came back and said that the hotel did not have  
21 security cameras outside. This had happened right  
22 outside the hotel in the portico.

23 And so at that point, I -- oh, and I remember I  
24 also walked around the car to see if perhaps our car had  
25 been vandalized. I was concerned. I didn't know if it

CERTIFICATE

STATE OF WASHINGTON )

)

COUNTY OF SNOHOMISH )

I, the undersigned Notary Public in and for the  
State of Washington, do hereby certify:

That the foregoing is a full, true, and correct  
transcript of the testimony of the witness named herein,  
including all objections, motions, and exceptions;

That the witness before examination was by me duly  
sworn to testify truthfully and that the transcript was made  
available to the witness for reading and signing upon  
completion of transcription, unless indicated herein that the  
witness waived signature;

That I am not a relative or employee of any party  
to this action or of any attorney or counsel for said action  
and that I am not financially interested in the said action  
or the outcome thereof;

That I am sealing the original of this transcript  
and promptly delivering the same to the ordering attorney.

IN WITNESS WHEREOF, I have hereunto set my hand and  
seal this 12th day of October, 2010.

\_\_\_\_\_  
Notary Public in and for the State of Washington  
residing at Edmonds, Washington.

(Notary expires 3/09/13)

(CCR No. 2699)

# **EXHIBIT 8**

1 UNITED STATES DISTRICT COURT  
2 FOR THE  
3 WESTERN DISTRICT OF WASHINGTON

4 JOHN DOE #1, et al.,

5 Plaintiffs,

6 vs.

7 SAM REED, et al.,

8 Defendants.

9 NO. 09-cv-05456-BHS

10 DEPOSITION UPON ORAL EXAMINATION OF REDACTED

11  
12  
13  
14 October 1, 2010  
15 Olympia, Washington  
16  
17  
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19  
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24 DIXIE CATTELL & ASSOCIATES  
25 COURT REPORTERS & VIDEOCONFERENCING  
(360) 352-2506 \*\* (800) 888-9714

EGELER (REDACTED, 10/1/10)

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1 A 9.

2 Q What it might be helpful to do, before we discuss the  
3 details of them, is to have you describe what each of these  
4 exhibits are. If you want to start with Exhibit No. 8, if  
5 you could tell me what that is.

6 A Okay. Are we on now?

7 Q We are on.

8 A Exhibit 8 is one of two examples that I took from the  
9 Internet just, I believe, yesterday, the date that I pulled  
10 these. Actually it was Monday, I guess, the 27th. There's  
11 two examples of pages of Google or Bing about me, about  
12 Faith and Freedom, and that are attack.

13 Q I don't understand what Exhibit No. 8 is. I don't see a Web  
14 site listed on this. Is this a printing from a Web site?

15 A It is a printing from a Web site.

16 Q It was printed when?

17 A It was printed Monday, the 27 -- September 27th.

18 Q What is the Web site?

19 A It's John Bisceglia and his name is on the first page of the  
20 8.

21 Q But what's the Web site?

22 THE WITNESS: What's the name of his Web site? I  
23 don't know.

24 Q (By Ms. Egeler) You don't know what Web site this came  
25 from?

EGELER (REDACTED, 10/1/10)

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1 A I don't know the name of it. I didn't realize that I should  
2 have brought the whole Web site. I brought his most recent  
3 advocating for death.

4 Q Did you copy things from a Web site and put them --

5 A Yes.

6 Q -- in another document and then print?

7 A No. I just printed them off his Web site.

8 Q Okay. I'm --

9 A Directly to the printer.

10 Q Because there's no Web site listed at the bottom of the  
11 page, but you're representing that John Bisceglia has a Web  
12 page?

13 A Yes.

14 Q And you did not alter in any way what appears there by  
15 deleting some of it, including other parts?

16 A I did not, no.

17 Q So you just pressed print and this is what came out?

18 A Yeah, that's correct. I apologize for not getting -- I was  
19 trying to save a little paper.

20 8, No. 8, is -- there's a list of people there:  
21 Senator John McCain, Tony Perkins. These are national  
22 people. REDACTED, REDACTED, Stephen Pidgeon, Bob  
23 Struble, Senator Val Stevens, Senator Dan Swecker,  
24 Representative Matt Shea.

25 Q It's okay. You don't need to read them off. This will be

EGELER (Gary Randall, 10/1/10)

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1 in the record, so all of these names will be there.

2 What is your concern?

3 A Okay. The title of -- well, he's advocating that someone  
4 kill us.

5 Q Where is that stated?

6 A On the next page and throughout the Web site, he states that  
7 we are trying to hurt him and his children and other  
8 people's children of -- that are gay.

9 And he said on page 2 -- and this is just recent. You  
10 can go back years on this -- "Now just try to tell me that  
11 we don't have serious reasons to defend ourselves and our  
12 children and maybe your children also of all sexual  
13 orientations from the hate speech spewed from Christian  
14 mouths."

15 So how does he suggest that they protect themselves?

16 Q Can you show me where you're reading that? I'm not tracking  
17 you.

18 A Page 2.

19 Q So is that the back of the first page? Correct?

20 A No. I'm sorry. It's the -- it would be page 3 --

21 Q So --

22 A -- the way this is copied.

23 Q So at the --

24 A No, the middle, middle of page 3.

25 Q But just to identify what page we're on, at the very top

EGELER (Gary Randall, 10/1/10)

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1           there, it's got in parens 44.6 percent?

2    A       Yes.

3    Q       Are we on the same page?

4    A       Yes, that's correct.

5    Q       So where on the page did you want me to look?

6    A       Right in the middle, the bold type, "Now to just try to tell  
7           me that we don't have serious reasons to defend ourselves  
8           and our children and maybe your children also of all sexual  
9           orientations from the hate speech spewed from Christian  
10          mouths."

11           This is -- on the last page of this is --

12   Q       Can we stay with this page and the piece that you just  
13           identified? Can you explain to me what your concern is with  
14           this?

15   A       Well, my concern is that there's a continued advocacy or  
16           violence on the part of this man.

17   Q       I see the piece that you've just read about defending  
18           ourselves. Can you show me where there's an advocacy for  
19           attacking or killing someone?

20   A       On the previous page, it says, "You see," and there's a  
21           check beside it --

22   Q       Right.

23   A       -- would be the back of page 1 per the copies you just made.

24           "You see, I get very angry and feel an intense need to  
25           defend innocent people from harm's way when I read about the

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1 family tragedies below. Knowing that they are a direct  
2 result of the ignorance, lies, misinformation, bigotry,  
3 pure-evil hatred of LGBTQ people is promoted daily by many  
4 Christian groups. I feel an intense need to defend innocent  
5 life from these assaults. As a child advocate and early-  
6 childhood teacher, I especially feel compelled to protect  
7 children."

8 Q Yes. And what is your concern with that paragraph that you  
9 just read in?

10 A The list on the previous page, the first page, says, "Here  
11 is a list of people whose mere existence is a serious threat  
12 to our safety." The fact that we exist is the threat.

13 Q Okay.

14 A The last page that I copied here and there's -- there is  
15 reams.

16 Q Let's stop. Let's stop. I just asked you about the  
17 paragraph that appears on the back of page 1. You read in a  
18 paragraph that begins, "You see, I get very angry and feel  
19 an intense need to defend innocent people," et cetera,  
20 et cetera.

21 Please explain to me how you feel that that is a threat  
22 or harassment.

23 A Because he's advocating using a gun on his Web site.

24 Q Please show me where he advocates using a --

25 A That's what I was doing.

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1 Q Okay.

2 A The last page, there's a picture and it's very prominent on  
3 his Web site, "The abuse needs to stop. Now. Armed gays  
4 don't get bashed. Pinkpistols.org."

5 Q And where does it advocate using guns on people and killing  
6 them as opposed to defending one's self from attack?

7 A I'm suggesting that listing a list of names who are  
8 pro-marriage, talking about the violence that these people,  
9 myself included, are perpetrating upon the gay community and  
10 advocating that abuse stops -- needs to stop now and the  
11 picture of a gun held in the hands of an individual is  
12 suggesting violence against this list, and that's exactly  
13 what he's doing.

14 Q Mr. REDACTED, do you belong to the NRA?

15 A I do not. I resigned.

16 Q Do you support individuals' rights to bear arms?

17 A I do.

18 Q Do you support the right of individuals to defend themselves  
19 if attacked?

20 A I do.

21 Q Does that mean that you support assertively going up to  
22 people that you don't agree with who have not physically  
23 attacked you, and rather than defending yourself,  
24 aggressively killing them?

25 A You'll have to restate that question.

EGELER (REDACTED, 10/1/10)

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1 Q I thought it was an easy one.

2 A I didn't realize I was on trial.

3 Q Do you believe that individuals have a right to bear arms to  
4 defend themselves --

5 A Yes.

6 Q -- or to -- do you feel that individuals, therefore, also  
7 have a right to bear arms to attack others who have not  
8 physically attacked them?

9 A No.

10 Q Can you please show me in this document, Exhibit No. 8,  
11 where this individual asserts that it would be appropriate  
12 to assertively attack someone as opposed to defending one's  
13 self?

14 A There is a very easy, if one wants to make that  
15 assumption --

16 Q I'm not asking for assumptions.

17 A -- easy transition --

18 Q Sir, I'm asking you to show me the words that assert that an  
19 assertive attack would be appropriate as opposed to  
20 defending ones' self.

21 A The whole Web site is hate.

22 Q I'm asking you --

23 A It is not on the page -- he does not advocate pulling the  
24 trigger on REDACTED on these pages.

25 Q Where in this document does he advocate pulling the trigger

EGELER (REDACTED, 10/1/10)

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1 on anyone who has not attacked physically innocent people?

2 A He does not.

3 Q Thank you.

4 Can you describe for me what Exhibit No. 9 is?

5 A This is a Web site that was apparently set up as a mock to  
6 mock faith-based or traditional value-based organizations.  
7 They define themselves as Faith Not Freedom News.

8 Q And that's the Web site that appears at the bottom left-hand  
9 corner of what you've printed. Is that correct?

10 A Yes.

11 Q And the date that you printed it, is that reflected in the  
12 bottom right-hand corner?

13 A Yes.

14 Q Okay.

15 A "Faith Not Freedom is an organization dedicated to  
16 supporting the work of Washington State theocrats, most  
17 notably Faith and Freedom Network," et cetera. They --  
18 page 2 -- 3.

19 Q And because what I copied for us in the original are a bit  
20 different --

21 A Yes.

22 Q -- and our copies are two-sided, let's identify the page  
23 you're on. Is that the one at the top that says, "Pam's  
24 Blend" --

25 A "Pam's Blend of Perversion Tries to Out Our Agenda."

EGELER (REDACTED, 10/1/10)

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1 Q Okay.

2 A Keep in mind that these people are speaking in a mockery  
3 position, okay, as though they agree with Faith and Freedom  
4 and REDACTED. "It should be of no surprise that the  
5 radical lesbian, Pam Spaulding tries to out my hero, REDACTED  
6 REDACTED." I'm not their hero.

7 They quote Pam Spaulding here as saying, "From  
8 REDACTED's point of view, if I disagree with someone who says  
9 that I should be executed because I'm gay, then somehow I'm  
10 being intolerant of that person's religion. The kind of  
11 tolerance REDACTED is looking for leads to violence. Should  
12 I condone my own execution? REDACTED apparently thinks so.  
13 REDACTED's sickeningly ended his post with a plea for  
14 donations to what he calls this ministry. He is using his  
15 authority as a Christian minister to broadcast to the world  
16 his certainty that I and every other gay person deserve  
17 death. When we" -- "when will the press and general society  
18 stop giving people like REDACTED a pass because he calls  
19 himself a Christian and a pastor and uses nice words like  
20 'faith.' Let's recognize his words for what they are: a  
21 condoning of lethal violence against gay people."

22 Now, there -- surely we can make a linkage because  
23 these people are all reading these sites. Surely we can  
24 make a linkage between Pam Spaulding saying and being  
25 requoted on this mock site that REDACTED is advocating

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1 lethal violence against gay people. That is a lie and that  
2 is slander, I am certain. I'm certain it is and we'll find  
3 out about that.

4 But I will tell you that, with those kinds of words  
5 being fed into the community, you have to create some kind  
6 of linkage between what these people are saying and what  
7 Bisceglia is saying and has said, and he did directly say  
8 that REDACTED , REDACTED , any churches and  
9 government buildings that are involved in supporting Senate  
10 Bill 5688 should be destroyed. He's scrubbed that from his  
11 Web site, but KIRO caught it before he scrubbed it and they  
12 ran a story about it.

13 Q Wait. He said what now? Can you repeat that?

14 A There should be linkage because these people are all  
15 communicating with one another. They're all aware of each  
16 other.

17 Q My question is: What did Bisceglia say that you claim was  
18 scrubbed from his Web site?

19 A John Bisceglia put on his Web site -- I saw it. I did not  
20 copy it. KIRO 7 saw it and reported on it. He said that  
21 REDACTED , REDACTED should be killed, and that  
22 church buildings and government buildings that were involved  
23 with or supportive of the R71 effort should be destroyed.  
24 That's why KIRO news picked it up, KIRO 7, not the radio,  
25 and reported on it.

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1 Q Do you remember those words --

2 A He scrubbed it.

3 Q -- exactly or are you guessing?

4 A Well, I'm not guessing. I remember it because, when people  
5 advocate that I get killed, that tends to stick in your  
6 mind. Is it an exact quote? I don't know. He scrubbed the  
7 site.

8 Q When was it posted on his Web site?

9 A I don't know. But KIRO, especially if there's a legal  
10 action taken, we can get the information from KIRO because  
11 they ran the story because they called me about it and  
12 interviewed me.

13 Q When did you see it on his Web site?

14 A When he put it up.

15 Q When was that?

16 A I don't remember the date. I don't know, Anne.

17 Q So you don't remember when you saw it, but you're certain of  
18 the words?

19 A Absolutely.

20 Q So you can -- you're saying under oath now that --

21 A Back then I didn't know it would be on trial now over this  
22 having to recall that. And I'm not out to get anybody. If  
23 I was out to get someone, I would have put out in the press  
24 a long time ago that Senator Murray's foster son accuses him  
25 of abusing him when he was a little boy. I would have put

1 C E R T I F I C A T E

2 I, REBECCA S. LINDAUER, a duly authorized Notary Public in  
3 and for the State of Washington, residing at Lacey, do hereby  
4 certify:

5 That the foregoing deposition of REDACTED was taken  
6 before me and completed on the 1st day of October, 2010, and  
7 thereafter transcribed by me by means of computer-aided  
8 transcription; that the deposition is a full, true, and complete  
9 transcript of the testimony of said witness;

10 That the witness, before examination, was by me duly sworn  
11 to testify the truth, the whole truth, and nothing but the truth,  
12 and that the witness reserved signature;

13 That I am not a relative, employee, attorney, or counsel of  
14 any party to this action or relative or employee of any such  
15 attorney or counsel, and I am not financially interested in the  
16 said action or the outcome thereof;

17 That I am herewith securely sealing the deposition of REDACTED  
18 REDACTED and promptly mailing the same to MS. ANNE E. EGELER.

19 IN WITNESS HEREOF, I have hereunto set my hand and affixed  
20 my official seal of this 9th day of October, 2010.

21

22

23

24

Rebecca S. Lindauer, CSR#2402

25

Notary Public in and for the State of  
Washington, residing at Lacey.